REMARKS

The present application was filed on June 24, 2003 with claims 1-23. Claims 24 and 25 were added by a prior amendment. Claims 1 through 25 are presently pending in the above-identified patent application.

In the Office Action, the Examiner rejected claims 1-10, 12-22, 24 and 25 under 35 U.S.C. §103(a) as being unpatentable over Gandhi et al. (United States Patent Application Publication Number 2004/0015351 A1), in view of Stuart et al. (United States Patent Number 6,868,154). In addition, claims 11 and 23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Gandhi et al. in view of Stuart et al. and further in view of Epstein et al. (United States Patent Number 6,754,626).

Independent Claims

Independent claims 1, 12, 18 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Gandhi et al. in view of Stuart et al. The Examiner asserts that Gandhi discloses a method for validating a textual entry of spoken words of a caller that monitors the textual entry of the spoken words and converting the spoken words to text using a speech recognition technique. (citing FIG. 5 and Par. 40). The Examiner acknowledges that Gandhi does not disclose the steps of receiving a telephone call from said caller and comparing the textual entry to the converted text to confirm an accuracy of the textual entry substantially during said telephone call, but cites Stuart for this purpose.

The Examiner asserts that Stuart et al. teach a method that receives a telephone call from the caller (col. 9, lines 55-59) and comparing the textual entry to the converted text to confirm an accuracy of the textual entry substantially during said telephone call. (*citing* col. 9, line 55, to col. 10, line 20).

While Stuart et al. may employ a speech recognition system to convert spoken words to text, there is *no* comparison of the textual entry to the converted text to confirm an accuracy of the textual entry. Rather, in the passages cited by the Examiner, Stuart et al. merely employs conventional voice recognition techniques (comprised of both a speech recognition subsystem and a keyed input recognition subsystem) to recognize vocalized utterances and keyed information. The

voice recognition means 802 monitors a call in order to recognize various key words, phrases or other utterances by either the calling customer or the call handling agent at any point during the call. Col. 9, lines 55-57. Once recognized, these key words or phrases act as *triggers*, and once identified by the voice recognition means, cause the invention to take a specific action based on the specific trigger encountered. *Id.* at lines 58-61. Thus, Stuart et al. is *merely* comparing the recognized speech to one or more predefined keywords that will act as a trigger. Further, "[w]hen the invention (of Stuart) recognizes a particular key word or phrase, the invention may automatically generate a report or may automatically transfer the call to a supervisor, based on the particular trigger instruction associated with the specific key word or phrase." Col. 10, lines 15-20. Stuart et al. does *not* disclose or suggest that the recognized speech is compared to the recognized keyed input.

The present invention, on the other hand, requires a comparison between (i) a textual entry of spoken words of a caller; and (ii) a speech recognized version of those spoken words. Independent claims 1, 12 and 18 require that the textual entry is compared to the converted text to confirm an accuracy of the textual entry substantially during the telephone call. In this manner, the present invention verifies the accuracy of the human agent. Generally, the present invention uses speech recognition as a tool to judge the accuracy of a human generated input. Thus, Stuart et al. does not disclose or suggest *comparing the textual entry to the converted text* during the call, as required by independent claims 1, 12 and 18, as amended.

Similarly, claim 19 is directed to a method for validating a spoken delivery of a *textual script*. According to this aspect of the invention, a comparison is required between (i) a speech recognized version of a spoken delivery of the textual script; and (ii) the textual script itself. In this manner, the present invention verifies the accuracy of the spoken delivery of the script. Again, this is not disclosed or suggested by Stuart et al. Among other distinctions, Stuart et al. do not address the spoken delivery of a textual script.

Dependent Claims

Dependent claims 2-11, 13-17 and 20-25 were rejected over various combinations of Gandhi et al., Stuart et al. and Epstein et al. Claims 2-11, 13-17 and 20-25 are dependent on claims 1, 12 and 19, respectively, and are therefore patentably distinguished over Gandhi et al., Stuart et al.
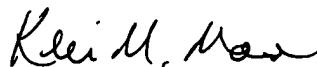
and Epstein et al. (alone or in any combination) because of their dependency from amended independent claims 1, 12 and 19 for the reasons set forth above, as well as other elements these claims add in combination to their base claim.

All of the pending claims, i.e., claims 1 through 25, are in condition for allowance and such favorable action is earnestly solicited.

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated.

Respectfully submitted,

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